

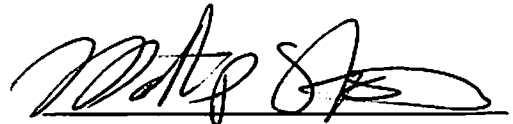
**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF THE COMMONWEALTH OF VIRGINIA  
NEWPORT NEWS DIVISION**

J.F.S, <i>A MINOR CHILD</i>	)	
<i>BY NEXT FRIEND AND SIBLING</i>	)	
MATTHEW P. STARBUCK	)	
PLAINTIFF(s), <i>PRO SE</i>	)	
v	)	ACTION NO: 4:18-CV-63
WILLIAMSBURG JAMES CITY COUNTY	)	
SCHOOL BOARD	)	
DEFENDANTS(s)	)	
_____	)	<b><u>MEMORANDUM</u></b>

**MEMORANDUM OF JFS IN SUPPORT OF SHOW CAUSE**

COME NOW, J.F.S, Minor Child, in his own capacity, to state his Memorandum in Support of the Show Cause statement filed by Matthew P. Starbuck, his general guardian and next friend in this action. The Clerk is ASKED to file the attached MEMORANDUM OF JFS IN SUPPORT OF SHOW CAUSE and REDACT the signature of J.F.S, which is only included for verification of it's authenticity. A non-certified copy is included for PACER filing.

Respectfully submitted,



Matthew P. Starbuck

4615 Sir Gilbert Loop  
Williamsburg, Virginia  
23185-7947

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**MEMORANDUM OF J.F.S IN SUPPORT OF SHOW CAUSE**

On June 12th, 2018, this Court addressed issues in regards to Mr. Matthew Starbuck's status as a non-licensed attorney who seeks to litigate this action on behalf of myself on a *Pro Se* basis, citing in part *Gallo v United States, 331, F. Supp. 2d 447 (E.D. Va. 2004)* and notes " [i]t is generally not in the interest of a child to be represented by a non-attorney, who will likely be unable to adequately protect her rights and vigorously prosecute litigation on her behalf". This Court also cities in part *Myers v Loudoun County Pub. Sch., 418 F.3d 395, 401 (4th cir 2005)* which holds this as a rule in general and also cites in part *J.M v Colvin, No 2:15cv475, 2016 U.S Dist. LEXIS 183976, at \*22-24 (E.D. Va. Dec. 22, 2016)* which establishes that there are exceptions to this rule held generally.

In *Maldonado Ex Rel. Maldonado v. Apfel, 55 F. Supp. 2d 296 (S.D.N.Y. 1999)* the Court addressed multiple factors in regards to this precedent, one of those being the difficulty to obtain counsel. As this Court understands, evident by the acceptance of the *in forma pauperis* application, myself and my custodian Mr. Matthew Starbuck lack the financial ability to hire

counsel for this case and the search for *Pro Bono* counsel has come up empty handed. For this reason and for this Court's legal precedent, I respectfully **MOTION** for a hearing for the Court to appoint a *Guardian Ad Litem*. Should the Court deny this or deny appointing a *Guardian Ad Litem*, I ask the Court to allow this case to proceed without counsel on the grounds that I am fully confident and understanding of Mr. Matthew Starbuck's and my own ability to pursue this case further. I find it is in my own interest and wishes to do so and considering I am of the age of 17, I believe I hold the psychological capacity to represent myself, through Mr. Matthew Starbuck, as much as any other natural person through the natural right of *Pro Se* status. This case is, in function, an appeal of a body of Government's actions and given the context of this case, only requires common reason and because of this, the nature of the case is not as understandable as to be impractical to proceed *Pro Se*

JFS

J.F.S

Plaintiff

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Williamsburg, Va

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